

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6282 CR-FERGUSON
Magistrate Judge Snow

Florida Bar Nos. 272817 &
947970

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT SCHACHNER,

Defendant.

**DEFENDANT ROBERT SCHACHNER'S
UNOPPOSED MOTION FOR CONTINUANCE**

Defendant ROBERT SCHACHNER ("SCHACHNER"), by and through his undersigned counsel, moves this Honorable Court for an Order to continue the sentencing in this cause until January 26, 2001, and in support states as follows:

1. On or about October 12, 2000, SCHACHNER voluntarily surrendered and was released pursuant to a \$50,000.00 Personal Surety Bond.
2. On or about November 3, 2000, SCHACHNER plead guilty pursuant to a negotiated Plea Agreement

15

3. SCHACHNER's sentencing is currently scheduled for January 12, 2001.

4. Due to the holiday season, the final Presentence Investigation Report ("PSI") will not be ready until January 9, 2001.

5. Counsel for SCHACHNER has conferred with counsel for the United States, Assistant United States Attorney Robin Rosenbaum, who has no objection to the Sentencing in this cause being continued until January 26, 2001. In addition, counsel for Schachner has conferred with United States Probation Officer Paul Cresce, who has no objection to the Sentencing in this cause being continued until that date.

WHEREFORE, Defendant ROBERT SCHACHNER respectfully requests this Court continue the sentencing until January 26, 2001, and for such and other further relief as this Court deems just and proper.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to: ROBIN ROSENBAUM, Assistant United States Attorney, 500 East Broward Boulevard, Fort Lauderdale, Florida 33301 and PAUL CRESCE, United States Probation Officer, 301 Simonton Street, Room 230, Key West, Florida 33040, this 8th day of January 2001.

Respectfully submitted,

RUDEN, McCLOSKEY, SMITH
SCHUSTER & RUSSELL, P.A.
Attorneys for Robert Schachner
15th Floor
200 East Broward Boulevard
Post Office Box 1900
Fort Lauderdale, Florida 33302
(954)764-6660; Miami (305)789-2700
Fax: (954)764-4996

By 

Marc S. Nurik
Florida Bar No. 272817

Todd I. Stone
Florida Bar No. 947970